II. REMARKS

Claims 2-20 are canceled without prejudice.

Claim 1 is amended to recite "A method for updating application configuration information in a plurality of files within an archive file." Support for this amendment may be found at least at Specification [0003]. No new matter is entered.

Claim 1 is also amended to recite "extracting decompressing the plurality of files within the archive file content from the archive file into an extracted archive file in to the temporary directory." Support for this amendment may be found at least at Specification [0026]. No new matter is entered.

Claim 1 is also amended to recite "updating application configuration information in the plurality of files to create an updated plurality of files by performing a series of steps." Support for this amendment may be found at least at Specification [0026]. No new matter is entered.

Claim 1 is also amended to recite "accepting a user specification of a file of the plurality of files, a field, an old value, and a new value." Support for this amendment may be found at least in the prior claim 3 and at Specification [0026]. No new matter is entered.

Claim 1 is also amended to recite "searching the field in the archive file content for the old value." Support for this amendment may be found at least in the prior claim 3 and at Specification [0026]. No new matter is entered.

Claim 1 is also amended to recite "archiving the archive file content updated plurality of files into the archive file according to the archive file structure in the structure file." Support for this amendment may be found at least at Specification [0026]. No new matter is entered.

Claim 1 is also amended to recite "wherein the archive file structure is the order and arrangement of a compressed archive file content the updated plurality of files within the archive

file." Support for this amendment may be found at least in the previous claim 1 and at Specification [0026]. No new matter is entered.

Claim 1 is also amended to recite "wherein the application configuration information data within the archive file is changed and wherein the archive file structure remains the same before and after the application configuration information data is changed." Support for this amendment may be found at least at Specification [0003] and [0026]. No new matter is entered.

Claim 1 is also amended to recite "wherein the field is an application configuration information position within the archive file content." Support for this amendment may be found at least in the previous claim 3 and at Specification [0003] and [0015]. No new matter is entered.

Applicant believes that the claimed invention as a whole is outside the scope of the cited art.

Rejection under 35 U.S.C. § 101

Claim 20 stands rejected under 35 U.S.C. § 101 for allegedly being directed to non-statutory subject matter. Final Office Action p.2. Claim 20 is canceled, thus, the rejection is moot.

Rejection under 35 U.S.C. § 103

First Ground of Rejection

Claims 1 and 7 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,405,265 (hereinafter Kronenberg) in view of Funduc, Search and Replace for Windows (4/12/2003 *available* *at* http://web.archive.org/web/20030412174159/http://funduc.com/search_replace.htm). Final Office Action pp. 3-5. Claim 7 is canceled and claim 1 is amended to incorporate features similar to features of claim 3. The Examiner admits claim 3 comprises features and limitations

that are outside the scope of the cited art. Final Office Action p.5. Thus, claim 1 comprises features and limitations that are outside the scope of the combination of cited art. Therefore, the rejection is moot.

Second Ground of Rejection

Claims 3, 5, 10, 12-14, and 20 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,405,265 (hereinafter Kronenberg) in view of Funduc, Search and Replace for Windows (4/12/2003 *available* *at* http://web.archive.org/web/20030412174159/http://funduc.com/search_replace.htm) and U.S. Patent Application Publication No. 2002/0129053 (hereinafter Chan). Final Office Action pp. 5-11. Claims 3, 5, 10, 12-14, and 20 are canceled. However, claim 1 is amended to incorporate features and limitations similar to features and limitations of claim 3. Thus, Applicant respectfully traverses the rejection as applied to amended claim 1.

In rejecting claims under 35 U.S.C. § 103, it is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. *See In re Fine*, 837 F.2d 1071, 1073, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). In so doing, the Examiner must make the factual determinations set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 17, 148 USPQ 459, 467 (1966), *viz.*, (1) the scope and content of the prior art; (2) the differences between the prior art and the claims at issue; and (3) the level of ordinary skill in the art. "[T]he examiner bears the initial burden, on review of the prior art or on any other ground, of presenting a *prima facie* case of unpatentability." *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Furthermore, "'there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness' . . . . [H]owever, the analysis need not seek out precise teachings directed to the specific subject matter of the challenged claim, for a court can

take account of the inferences and creative steps that a person of ordinary skill in the art would employ." *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1741, 82 USPQ2d 1385, 1396 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006)). Obviousness is then determined on the basis of the evidence as a whole and the relative persuasiveness of the arguments. *See Oetiker*, 977 F.2d at 1445, 24 USPQ2d at 1444; *Piasecki*, 745 F.2d at 1472, 223 USPQ at 788.

Claim 1 recites "updating application configuration information in a plurality of files within an archive file." The combination fails to teach these limitations at least because the combination is silent to "application configuration information." The cited portions of Kronenberg, Funduc, and Chan are silent to "application configuration information," much less "updating application configuration information." Hence, "updating application configuration information in a plurality of files within an archive file" is outside the scope of the combination of cited art.

Claim 1 also recites "recording an archive file structure of the archive file in a structure file in the temporary directory." The combination fails to teach these limitations at least because Kronenberg fails to teach a "structure file," as set forth in the claim. The Examiner alleges Kronenberg's loading a central directory into RAM teaches the limitations. Final Office Action p.3 (citing to Kronenberg 3:45-52 and 4:19-21). Even if, *arguendo*, loading a central directory into RAM could be interpreted as meeting the claim's "recording an archive file structure," Kronenberg is silent to the central directory being recorded in a file. Rather, Kronenberg's central directory is merely loaded into RAM, but not recorded in a file. The cited portions of Funduc and Chan are not relied upon and do not remedy these deficiencies. Hence, "recording

an archive file structure of the archive file in a structure file" is outside the scope of the combination of cited art.

Claim 1 also recites "extracting the plurality of files within the archive file to the temporary directory." The combination fails to teach these limitations at least because Kronenberg merely teaches extracting a single file from an archive. The Examiner alleges Kronenberg teaches the limitations. Final Office Action p.3 (citing to Kronenberg FIG. 5, step 516, 1:39-43, and 5:1-7). Kronenberg teaches extracting a file when receiving a read file operation (FIG. 5, elements 508, 513, and 516) or a write operation (FIG.5, elements 509, 514, and 516), yet is silent to extracting more than one file. The cited portions of Funduc and Chan are not relied upon and do not remedy these deficiencies. Hence, "extracting the plurality of files within the archive file to the temporary directory" is outside the scope of the cited art.

Claim 1 also recites "wherein the application configuration information within the archive file is changed and wherein the archive file structure remains the same before and after the application configuration information is changed." The Examiner alleges Kronenberg teaches the limitations. Final Office Action p.4 (citing to Kronenberg 3:64-4:14 and 5:14-23). Specifically, the Examiner interprets Kronenberg's central directory as meeting the claim's "archive file structure." Even if such an interpretation were proper, *arguendo*, the combination fails to teach "the archive file structure remains the same before and after the application configuration information is changed" for at least two reasons.

First, the combination fails to teach "the archive file structure remains the same before and after the application configuration information is changed" because Kronenberg's teachings of "without updating the central directory" only occurs when a file system operation has not changed the central directory information. The Examiner interprets Kronenberg's teachings of

returning without updating its central directory (Kronenberg 3:64-4:14 and FIG. 4, element 409), as meeting the claim's "the archive file structure remains the same." Final Office Action p.4. Kronenberg teaches returning without updating its central directory only when file system operations such as "rename," "copy," "move," or "delete" do not change the central directory. Kronenberg FIGS. 3-4, 3:17-28, and 3:64-4:14. Kronenberg is silent to returning without updating its central directory when file data is changed. In other words, Kronenberg teaches, at best, the central directory remains the same before and after a file system operation has not changed the central directory. However, Kronenberg is silent to its central directory remaining the same before and after file data is changed.

Second, the combination fails to teach "the archive file structure remains the same before and after the application configuration information is changed" because Kronenberg's teachings of "file data has changed" causes Kronenberg's system to update its central directory. Kronenberg teaches when a file operation (e.g., a write) changes file data, the central directory is updated. Kronenberg FIGS. 3 and 5, 3:34-44, and 5:21-23. In other words, Kronenberg teaches, at best, the central directory is updated after the data is changed. However, Kronenberg is silent to its central directory remaining the same before and after file data is changed. Funduc and Chan are not relied upon and do not remedy these deficiencies. Hence, "the archive file structure remains the same before and after the application configuration information is changed" is outside the scope of the combination.

Claim 1 also recites "wherein the data within the archive file is changed and wherein the archive file structure remains the same before and after the data is changed." The combination fails to teach these limitations at least because Kronenberg updates its central directory when file data has changed. The Examiner alleges Kronenberg teaches the limitations. Final Office

Action p.4 (citing to Kronenberg 3:64-4:14 and 5:14-23). Kronenberg teaches returning without updating its central directory (Kronenberg 3:64-4:14 and FIG. 4, element 409), which the Examiner reads onto the claim's "the archive file structure remains the same before and after the data is changed." Final Office Action p.4. However, Kronenberg teaches returning without updating its central directory only occurs when file system operations such as "rename," "copy," "move," or "delete" do not change the central directory. Kronenberg FIGS. 3-4, 3:17-28, and 3:64-4:14. Kronenberg also teaches when a file operation (e.g., a write) changes file data, the central directory is updated. Kronenberg FIGS. 3 and 5, 3:34-44, and 5:21-23. In other words, Kronenberg teaches updating its central directory when data changes, but fails to teach not updating its central directory when data changes. The cited portions of Funduc and Chan are not relied upon and do not remedy these deficiencies. Hence, "wherein the data within the archive file is changed and wherein the archive file structure remains the same before and after the data is changed" is outside of the scope of the combination.

Claim 1 also recites "wherein the field is an application configuration information position within the archive file content." The combination of cited art fails to teach these limitations at least because Chan's look in drop down menu does not meet the claim's "field." The Examiner admits Funduc fails to teach the claim's "field" and alleges Chan's Look In drop down menu meet's the claim's "field." Final Office Action p.6 (citing to Chan FIG. 13, element 312). Chan, at [0043], states "The look in dropdown menu 312 allows a user to choose to search in formulas, values or comments." In other words Chan's look in drop down menu at best allows the user to choose a type of cell in a spread sheet (e.g., a cell containing a formula, a cell containing a only a value, or a cell containing comments), yet Chan is silent to its look in dropdown menu being "an application configuration information position" within the spread
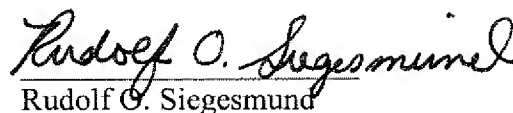
sheet, much less within an archive file. Kronenberg is not relied upon and does not remedy these deficiencies. Hence, "wherein the field is an application configuration information position within the archive file content" is outside the scope of the combination.

Thus, the claim comprises features and limitations that are outside the scope of the cited art. Therefore, Applicant respectfully requests that the rejection be withdrawn.

CONCLUSION

Applicant submits that the claims are now in condition for allowance.

Respectfully submitted,

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